

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN DOE,

Defendant

) Criminal No. 20cr10082
)
) Violation:
)
) Count One: False Statement on Passport
) Application
) (18 U.S.C. § 1542)
)
) Forfeiture Allegation
) (18 U.S.C. § 982(a)(6) and 28 U.S.C.
) § 2461(c))

SEALED

INDICTMENT

COUNT ONE

False Statement on Passport Application
(18 U.S.C. § 1542)

The Grand Jury charges:

On or about May 29, 2010, in Charlestown, in the District of Massachusetts, the defendant,

JOHN DOE,

willfully and knowingly made false statements in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated: (1) that his name and personal and biographical information were that of another individual whose initials are J.A.A.; and (2) that he had never used a different name, which statements he knew to be false.

All in violation of Title 18, United States Code, Section 1542.

FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(6) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1542, set forth in Count One of this Indictment, the defendant

JOHN DOE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6): any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and any property, real or personal, that constitutes, or is derived from or is traceable, to the proceeds obtained directly or indirectly from the commission of the offense, or that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(6), as result of any act or omission of the defendant—

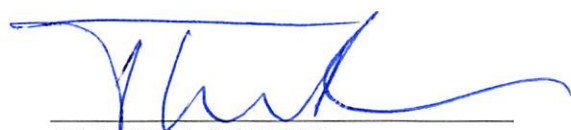
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(6).

A TRUE BILL


FOREPERSON



ALATHEA PORTER
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: MARCH 12, 2020
Returned into the District Court by the Grand Jurors and filed.


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